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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN LAWRENCE DEAN,

Defendant.

Case No. 2:15-CR-00166 DB

UNITED STATES' NOTICE OF  
INTENT TO RELY ON EXPERT  
TESTIMONY

Judge Dee Benson

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The United States Attorney, by and through the undersigned Assistant United States Attorney, in compliance with its obligations under Federal Rule of Criminal Procedure 16(a)(1)(G), hereby submits the United States' notice of intent to rely on expert testimony. The following is a non-exhaustive list of witnesses the government anticipates will give expert testimony during the course of trial.

**1. R. Kent Owens, Jr., Special Agent, Bureau of Alcohol, Tobacco,  
Firearms and Explosives –**

**Statement of Qualifications**

Special Agent Owens' curriculum vitae is attached hereto.

Proposed Testimony of SA Owens

Special Agent Owens will testify regarding the origin of the firearms as they relate to the interstate nexus element. Specifically, Special Agent Owens will testify that the firearms and ammunition seized in this case were manufactured outside the state of Utah. He will base his opinion upon training, experience, and upon his examination of the firearms and ammunition at issue.

The government reserves the right to call additional experts during the course of the trial, as the need arises and after proper notice, as the evidence develops.

RESPECTFULLY SUBMITTED May 29, 2015.

CARLIE CHRISTENSEN  
Acting United States Attorney

/s/ Daniel R. Strong  
DANIEL R. STRONG  
Special Assistant United States Attorney